

# Plain English: wrong solution to an important problem

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*This article critically reviews the claims of the Plain English movement. It is argued that the evidence in support of the movement is inadequate or insufficient. Empirical studies are also presented showing that ways of writing documents that do not adhere to Plain English principles produce more understandable documents than those using Plain English principles. A conceptual reconsideration of the real problems at stake is offered. The reconsideration shows why Plain English cannot be the real solution to the problem of understanding documents. Alternative principles are offered and their implications discussed.*

## The Plain English movement

The history of the Plain English movement reads like an extraordinary success story. 'Plain English' started in the United States in 1971 with the American Council of Teachers of English forming a committee on Public Doublespeak. Their aims were legitimated on a broad scale when President Carter issued an executive order in 1978 requiring 'clear and simple English' for all government regulation (Danet, 1980). A similar policy was adopted by the British Government in 1982 (Cutts & Mather, 1986) and the Australian Government moved in the same direction at the beginning of 1984 (Law Reform Commission of Victoria, 1986).

Now, after only twenty years, a plain language policy has been adopted by all the major English-speaking countries in the world and is even penetrating into

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non-English speaking countries, such as Japan. Not only has it spread across the globe, but it has penetrated even the most traditional of industries and professions, such as the life insurance industry and legal profession respectively.

The success of the movement can, in part, be explained by the severity of the problem it is trying to address—that of incomprehensible public documents. According to Redish, working from the Document Design Center in Washington: “The objective ... is to have writers communicate effectively with their readers” (Redish, 1985, p.126). Similarly in Australia it has been argued that Plain English “enables documents to be clearly written and well designed so that all members of the community affected by them can read them easily and understand their rights and obligations readily” (Law Reform Commission of Victoria, 1986, p.i).

The importance of legal and other public documents that can be understood and used by ordinary citizens and consumers cannot be overstated. If such documents are understood by the ordinary people to whom they are relevant, we have made an important contribution to improving equity in society. That the ordinary citizen and consumer is faced with an ever increasing barrage of incomprehensible documents is sufficient grounds to justify the spread of a movement dedicated to resolving the problem.

The very spread and growth of the movement would seem all the justification needed to say it must be good, it must work: why else would so many people advocate it? But we must be very careful indeed in taking the spread of a movement as evidence for the efficacy of its solution. I can think of more than one political or religious movement that has been widespread but which has not, in the end, provided a good or effective solution that we would approve of. And this, I want to argue, is exactly the situation with the Plain English movement. The movement has taken a very important problem—that of reader understanding (or misunderstanding as is more often the case)—and applied a solution that is not, in the end, a good one. It seems good but it does not address the real problem.

The major aim of this paper is to lay out an extended argument against the Plain English solution, drawing on empirical evidence and theoretical argument to do so.

### What is Plain English anyway?

In 1979, Charrow wrote a paper entitled ‘What is Plain English anyway?’. In that paper she says:

Plain English has come of age, and many people who have been fighting for it for years are delighted. I too would be delighted—if I were certain of what Plain English is, or if I could be certain that everyone who talks Plain English and rewrites in Plain English has the same conception of what it is. (p.1)

In my own review of the Plain English literature both before and since Charrow’s paper, the same position seems to stand. At the superficial level, though, there seems to be a common conception of avoiding gobbledygook or jargon. Usually this boils down to writing in short, common and easily understood words. But what is easily understandable by one group of people may not be by another, and some short words are not easily understood while some long words are. In other words, even this superficial level of describing Plain English is unsatisfactory.

The implicit conception of Plain English also seems to have changed somewhat over the years. If you read articles on Plain English written in the 1970s and early 1980s most, if not all, of the focus is on the linguistic structure and writing style of the documents (eg. Cutts & Maher, 1984; Redish, 1985). In the later 1980s the focus expanded a little to include additional structural and graphic features (eg. Eagleson, 1990). And most recently, the focus has expanded further to include some recognition of the reader (eg. Kimble, 1992). Regardless of this expansion of focus, the rules for employing Plain English remain a grab bag of admonitions, varying according to the admonisher. And this very grab-bag nature of Plain English rules is enough to raise concern about the Plain English movement.

But despite the vagueness in definition and the scope of what is meant, there is still some commonality. All the advocates of Plain English have the intent of changing the written document using a simpler and clearer style so that it is more clearly understood. It is this concern with simplification in order to make a document more understandable that is the chief distinguishing feature of advocates of Plain English. It is not what is actually done, or the style employed, but the intent of the advocate or writer that marks a member of the

Plain English movement. In particular, it is this concern with simplification in order to improve understanding that is open to empirical question

### Claims and evidence

The conventional Plain English solution has been to write in clear and simple English so that readers can understand. To verify that this is an effective solution we need empirical evidence that shows that understanding is improved when clear and simple English is used—whatever clear and simple English may be.

Unfortunately, that is not the evidence often presented in support of the use of Plain English, if any evidence is given at all. Instead, the criteria for success are usually based on the writing style, not in the reader's comprehension. In other words, Plain English is judged to 'work' when Plain English is written—a rather circular, and generally not acceptable, form of empirical verification. This argument mistakes the appearance of the thing for its efficacy in use.

For example, a commonly cited criterion for the effectiveness of Plain English is a decrease in words in a document after the application of Plain English principles (eg. King, 1983; Kelly, 1989). But just because there are less words, we cannot possibly infer that this automatically makes the document more understandable. No doubt it could, but it does not logically, or practically, follow that it will.

Other attempts at measuring effectiveness have employed user readability tests (eg. Kelly, 1989). But again, while this can give a gross average estimate of reading age necessary, it is still not a measurement of understanding. Readability is simply not the same as comprehension (Charrow, 1979). And again, while it may bear some relationship to comprehension, readability does not logically, or practically, ensure it. Indeed, this recognition led most researchers in our discipline to discard the measures more than a decade ago.

A third type of claim often made about the efficacy of Plain English is in terms of savings made or improvements in organisational efficiency (eg. see Eagleson, 1990). But when these reports or claims are subject to the normal criteria for assessing empirical research they are found to be either empirically suspect or to have used far more than a Plain English writing style in the document development (eg. the work of the Document Design Center).

In my continuing review of the literature in this area, it has only been in the last year that I have found any genuine empirical evidence regarding the efficacy of Plain English for documents. In a report on an International conference on Discourse and the Professions, the work of Ruth Wodak on reformed Building Regulations in Germany was discussed. She tested Plain Language legislation by asking people to paraphrase the new and old. Data showed "the level of improvement was disappointing in view of the size of the investment" (Clarity, 1992, p.29). So, if we accepted this rather limited evidence, we can conclude at best that Plain English may lead to a minor improvement. But it does not lead to the global improvement generally claimed.

In reviewing the Plain English literature in 1979, Charrow & Charrow pointed out that "there are no criteria for determining what constitutes Plain English and no empirically determined rules for rewriting" (p. 1307). In my own review of the literature, I have come to the same conclusion today. Moreover, the evidence provided by the movement is either inadequate to justify its claims or fails to offer necessary support for them.

### Counter evidence

A different type of evidence comes from research at the Communication Research Institute of Australia. Over the past eight years we have undertaken both basic and applied research into all manner of communication problems. Wherever possible in our research we have gathered data to test the claims of the Plain English movement.

We wanted empirical proof that Plain English *per se* would lead to better comprehension. And the best empirical proof is whether readers understand documents better after reading a Plain English version than after reading an equivalent document which is not in Plain English. Three studies, two using insurance documents and one a residential tenancy document, are of particular relevance here. (Details of these studies are documented in Penman, 1990 and Penman, 1992.)

APP

### Insurance documents

In the first study of insurance documents we investigated four different versions of an insurance investment document—a common product in the life insurance industry. Version 1 was the policy document then in public use and written in conventional legalese. Versions 2, 3 & 4 were three different Plain English versions of the same policy. These versions were written by a Plain English expert who had no association with us.

We tested 18 participants, all over 25 years of age and all English speakers. They were instructed to read the documents aloud and to make sense of them as they were reading. They were asked to say whenever they had problems with understanding and to talk about these difficulties. This is an extension of the formal reading comprehension protocol method (Swaney, et al, 1981).

Basically all readers found all four versions of the policy document difficult. And most of the problems were ones of general comprehension. They simply did not understand the basic insurance concepts on which the product and policy was based—regardless of whether it was written in Plain English or legalese. Plain English was not enough to make this insurance document comprehensible to the actual people for whom it was designed.

The insurance investment policy used in the first test was a particularly complex one and one not likely to be used by a large portion of the population. So in our second test, we chose a more common one—car insurance documents. As part of our development of a new policy booklet, we did a comparative test of the then current Plain English policy booklet and a prototype version we were developing to test some different principles. This test was important because the NRMA Plain English Car Insurance Policy has been used as a model case for the effectiveness of Plain English (King 1983).

With this study we used a criterion of effectiveness proposed by an advocate of the Plain English movement: "For a document to be in Plain English, the people who use it must be able to find the information they need easily, and understand it the first time they read it" (Redish, 1985, p.126).

We developed a number of different problem scenarios that often happen in the real world and then asked people to use the booklet to find out what they were covered for and what they had to do. For example they were asked "If

your car is stolen, do you have to report it to the police?" and "How much will the NRMA pay if your trailer is stolen?" We had 18 scenario questions and we asked 17 respondents to resolve them; eight using the Plain English booklet and nine using our prototype.

Our data showed that people using the Plain English version were less likely to successfully find the information and less likely to correctly answer the questions than those using our prototype. Overall, the Plain English booklet was much harder to understand than the prototype we developed. And our prototype did not follow Plain English guidelines. Instead there was as much focus on the structuring and accessing of the documents as there was on the language in which it was written (see Penman, 1990).

We concluded from these two studies that Plain English did not improve readers' understandings. In fact, restructuring of the documents was more efficacious for readers' understandings than any change of words alone.

### Problem-solving documents

Our third study was concerned with developing problem-solving handbooks for tenants and landlords. These handbooks were to be used to help in resolving tenancy disputes under the Residential Tenancies Act in Victoria. These handbooks were necessary because landlords and tenants frequently did not conform to legal requirements and frequently were not able to properly use the Residential Tenancies Tribunal.

From our earlier work with insurance documents we had generated a set of broad principles for writing comprehensible documents (see Penman, 1992). These broad principles will be discussed in the next section of this paper. But, for the moment, the major point to be made is that they did not follow the conventional principles of the Plain English movement.

During the prototype development period for the problem solving handbooks, the government issued a Plain English version of a Rights and Responsibilities booklet for tenants and landlords. We tested our final prototype against the Plain English version, using the same type of scenario method described above. For example, tenants were asked what they could do if the landlord increased the rent, after having increased it less than six months ago. In total, five different scenarios were put to real tenants and landlords, respectively.

**Table 1**

Percentage frequency of people who resolved problems successfully

Problem	NEW BOOK		CURRENT P.E. BOOK	
	Easily solved	Solved with some backtracking	Easily solved	Solved with some backtracking
<i>For landlords</i>				
2. Rent increase	64%	36%	67%	33%
3. Tenant damage	29%	59%	0%	0%
4. Unpaid rent	71%	29%	0%	0%
5. Bond and back rent	64%	36%	50%	50%
6. Tenants breaking lease	64%	21%	0%	67%
Completion of notice correctly	85%		NA	
<i>For tenants</i>				
2. Rent increase	90%	10%	17%	50%
3. Right of landlord to enter	90%	0%	67%	33%
4. 14 days to vacate	50%	40%	0%	0%
5. Broken toilet repair	60%	30%	0%	83%
6. Moving at end of lease	80%	20%	33%	55%
Completion of notice correctly	80%		NA	

Table 1 shows the data from comparative testing of the new problem-solving handbook and the then current Plain English book. In all instances, more people could resolve the problems, and do so correctly, with our handbook than with the Plain English one then in use. They could also, in all instances, reach the correct resolution faster.

### The import of the findings

The major import of these tests and the critical analyses of the Plain English arguments is not that Plain English is bad *per se*, but rather that it is not the real

answer to the problem of understanding. Writing in Plain English may be important some of the time, but there is far more to making documents understandable than just rewording them in simpler English. Just because a document appears simple is no guarantee that it is actually understandable from the reader's point of view.

We need to address issues beyond mere language style, and that is exactly what we did in the second and third tests with our own prototypes. My major argument is that we need to adopt a broader communication perspective to fully understand how we can improve public documents. I am also arguing that resorting to Plain English as the solution is not enough—indeed it may make no improvement at all because the solution does not address the real problem of understanding.

## A conceptual reconsideration

### Defining the problem

In order to appreciate why a seemingly obvious solution—Plain English—does not appear to solve the problem of understanding we need to take a step back to look at how the problem has been defined. In doing this I draw on the persuasive and insightful argument of Donald Schön (1979). While Schön was primarily concerned with social policy, his argument still holds for a range of social problems. For Schön, the essential difficulties in finding solutions to social problems “have more to do with problem setting than with problem solving, more to do with ways in which we frame the purposes to be achieved than with the selection of the optimal means for achieving them” (1979, p. 255). Problem settings come out of the stories people tell about troublesome situations, the stories that they use to describe what is wrong.

To illustrate, if we return to the Plain English literature, we find a striking consistency in the stories told about what is wrong. In nearly all instances, the stories centre on the problems with gobbledygook, jargon, bureaucratese and the like (Charrow, 1979). In other words, the problems of misunderstanding are being defined in terms of bad words. So, from that definition, the solution is obvious—change the words. Unfortunately there is no substantial evidence that

changing the words really does improve understanding in the universal way the Plain English movement implies.

Indeed, the Plain English solution is premised on a peculiarly limited, albeit prevalent, view of communication—a view identified by Reddy as the 'conduit metaphor' (1979) and one that I have argued against at length elsewhere (eg Penman, 1988). In this view of communication, language is seen as the transfer vehicle for thoughts and ideas. We communicate by putting our thoughts into words and sending them to a receiver who takes the thoughts out of the words. This view is well-illustrated in some standard Plain English texts:

- the use of language is to convey wishes, thoughts, feelings from one person to another (Burgess, 1964, p.16)
- this book is wholly concerned with ... the choice and arrangement of words in such a way as to get an idea as exactly as possible out of one mind into another (Gowers, 1962, p.7)

This prevalent view was expressed recently in an even more extreme and bizarre form. At an international conference in Sweden on Discourse and the Professions, a respondent was reported as saying:

- Martin Cutts was expecting too much from plain language. The purpose was to improve communication: improving the message was another problem. (Clarity, 1992, p.30)

With such a statement, we have a curious separation of communication from the message and the implication that the style of words and their presentation (ie, 'communication') had no bearing on the meaning. To rephrase this statement into 'conduit' terms, the speaker is saying that we need only attend to the vehicle (language) and that the thought or idea was a separate problem.

The pathological implications for society of this prevalent view of communication are well documented by Reddy (1979). But for our purposes we can identify four core problems (Penman, 1988). First, people are seen as separate from the generation of meaning. Meanings are assumed to be in the words and provided the words travel unsullied, the meaning put in will be the meaning taken out. Second, the actions of people involved in the process are seen as being separate events—messages are sent, or written, and then received, or read. Third, the active doings of people in communication, whether it be in conversation or in reading and writing, are turned into

products or effects on another. And, finally, the communication process is treated as if it was a concrete, tangible entity. This is particularly so when you look at how the concept of a message is treated. A message is a concrete entity that we send to, or get across to another.

These four core problems are exacerbated when we are dealing with written documents. Because such documents are concrete entities it is all too easy to assume that they carry the message. But they no more do so than our words do in conversations. In all instances, the process of generating understanding out of our language is more complex than that. In order to steer a path away from the simplistic and ineffectual solution offered by the Plain English movement we need to reconceptualise the problem of communication and understanding.

### Understanding & communication

The problem of communication and understanding is, in essence, a hermeneutic problem. What I wish to propose here is a redefinition of the problem of communication that arises out of a broad critical-hermeneutic tradition but which is more commonly referred to these days as a constructionist's position. Fundamental to this position is the notion of understanding as 'discursive construction' (Gergen & Semin, 1990). As I elaborate on this proposition below, please bear in mind that even though the argument may appear to be more relevant to conversation than written documents, this is not the case. I shall specifically deal with this in the following section.

The notion of understanding as discursive construction addresses all of the four core problems with the conduit view of communication mentioned above. First, people and not the message *per se*, are seen as the process of meaning generation; they are actively involved in constructing their understanding in discourse. Second, the people are not seen as sending and receiving messages in some sort of reactive fashion; instead they are seen as voluntarily intertwined so as to bring about their understandings. Third, the people are not sending messages to have effects on others, but are jointly involved in the on-going creation of meaning. And, finally, the message is not a concrete entity, meaning does not exist outside of the joint action and the context of that action (see Penman, 1988 for further elaboration).

### Understanding the written word

The notion of understanding as discursive construction also points to the importance of the general concept of discourse *per se*—even when it is writing and reading the written word. Illich and Sanders' (1988), coming from a different tradition than that used here, have some very compelling arguments about discourse and the written word. They point out that the written mode has been developed to administer and record society, not to explain it (see also Goody, 1986). They then argue that the understanding of explanations, coupled with the ability to explain what has been understood, is basic to oral discourse, not to the written mode.

In the first instance, Illich and Sander's argument suggests that written documents explaining how to do things or how things work are very different from the classic informational document. The former documents, as a consequence, rely very much on discourse features to generate understanding. Moreover, the argument suggests that there is a need to make distinctions between different types of written documents and to generate styles appropriate to their aims. This very need to generate different styles for different purposes flies in the face of the universal Plain English argument. But it is congruent with a general discourse principle—viz, that you talk/write in ways to meet your listener's/reader's needs and yours.

Our of these conceptual reconsiderations, it is possible to specify a set of broad principles for writing documents that enhance understanding. These principles rely on the concept of understanding as discursive construction.

#### *Understanding positions and audiences*

When we are in a discourse mode, we are aware of being in it with another—and this is as much the case for talking as for writing. And in this mode, whether we write or talk, we do so from a particular position (Sless, 1986). This position influences what we have to say as speakers or authors and what is understood to be said by listeners or readers. We write and talk better if we appreciate what our position is and how it affects what we do.

We also write and talk better if we understand the position of our audience and their natures and needs. Different audiences will have different natures and needs and thus require different ways of communicating. It is for this reason,

amongst others, that I remain concerned about the belief in the universality of the efficacy of Plain English.

The problem of understanding is a complex one and cannot be treated with the application of a simple universal writing style. While the writing style of Plain English may indeed be an important one to consider and use in many instances, it is not the panacea for all ills. The audiences and their needs and problems need to be considered first and the choice of an appropriate style made after that consideration.

#### *Context of meaning and use*

The context in which a document is read and, most importantly, the use to which it will be put, is a critical factor in understanding. For the reader, the document is only of importance if it addresses the needs of their social practices. This requires a far more radical change in document design than just a translation for clarity. It requires a writing style that draws on the everyday discourse features of our oral language. A discursive structure and style aids understanding, when understanding is necessary to do things.

For instance, poorly written (understood) documents reflect a set of social practices and uses that are important to the writer and the way they use the documents. But the context of use and the ensuing social practices are usually quite different for ordinary users of the documents. This is particularly the case when we consider legal documents and the almost incompatible set of social practices between lawyers and ordinary citizens. In some ways, Plain English also attempts to address these sets of social practices. Plain English legal documents are designed to inform the citizens of their rights and obligation under the law and how they can act within the law. But you cannot assist these social practices by simply appealing to a style of writing. To inform people about how they can act, you need to know how they will use the document and then write accordingly.

#### *Pragmatic test*

When we are dealing with language and communication we must recognise the fundamentally slippery nature of words and meanings. The very open ended, symbolic features of language make meanings fundamentally and unavoidably

uncertain. Uncertainty means different readers understand differently. Despite all, and often desperate, attempts of writers, especially legal ones, to ensure certainty, and avoid different understandings, this is fundamentally impossible. Regardless of whether clarity or tortuous legalese/bureaucratese is chosen as the approach to documents, neither will ever guarantee certainty of meaning across different readers or different times of reading.

From the perspective of communication theory and the philosophy of language followed here, there is no real struggle between certainty and understanding. At the most, we have a tension between different ways of understanding—all fundamentally uncertain to some extent.

Because of this, the real and only test of understanding can be in the use of the documents. Can the reader understand and act on what is read? That is the critical test and one that, ideally, should be applied to every document drafted.

It is important to emphasise here the need to test for the capacity to act with most documents. It is simply not good enough to have someone say, 'Yes I understand'—that can be the source of many confusions over time. Most public documents must be understood in order to engage or not engage in certain actions. Thus the final test of a document becomes whether the people actually adhere in action to the requirements laid down in the document.

## Conclusions

The results of the research projects discussed here and the conceptual reconsiderations offered raise a number of fundamental issues about the nature of writing and the written tradition(s), as well as about the nature of communication in a broader sense.

In the first instance, the research raises serious doubts about the efficacy of Plain English as the solution to the problem of understanding written documents. There is insufficient or inadequate evidence in support of the claims of the movement. Further, the evidence presented here argues against Plain English as a real solution.

Second, the obviousness of Plain English as solution to the problem of understanding rests on a peculiar and limited view of communication. The

obviousness disappears when you reconsider communication and understanding in the way presented here. Essentially, if you conceive of communication as a very complex and messy business out of which understanding is constructed, there is no obvious and simple solution to the problem of understanding. There is no one style, approach or structure that will suit all purposes of understanding.

Third, the writer of documents needs to be as much as interactive partner in the meanings generated out of text, as participants in dialogue. In fact, the preliminary evidence presented here and the underlying theory, suggests that the more documents draw on dialogue modes and structures, the more they could enhance understanding. This is an important point that needs further investigation.

Fourth, the arguments here also suggest a need to reconsider what it is that is being taught in written communication courses. While an understanding of the nature and structure of language as we conventionally know it is important, there is far more to writing good documents than that. In particular, there is a need to understand discourse as much as writing *per se*, a need to understand iterative testing processes; and a need to understand how to understand the reader.

As a final point, I need to make it clear that my concerns about the Plain English movement and the potential ramifications for the production of public documents do not rest solely on empirical and theoretical grounds—I have grave political concerns as well. To understand these, the Plain English movement should be seen in its proper historical context.

The movement as it is currently named did become widespread publicly in the 1970s. But it had a major precursor in the early 1930s with Ogden's promulgation of *Basic English* or Hogben's *Interglossa*. Both are attempts to create a world language based on English, containing less than 850 words. They were also an ultimate effort to standardise speech according to a simple written model (Illich & Sanders, 1988).

George Orwell was a major supporter of this earlier movement and joined the BBC to promote the use of Basic. It was out of this experience that he came to the realisation that Basic "could only be used as a deadly, mechanical substitute



for thought" (Illich & Sanders, 1988, p.109). It was from this experience with Basic that Orwell first wrote his essay on the *Politics of the English Language* (Orwell, 1962) and then 1984.

Orwell's concept of Newspeak introduced in 1984 is not quite what it has come to mean today. Critics who use the word today usually mean either the corrupt English of propagandists or the ambiguous, 'empty' language of politicians and broadcasters. But Orwell's Newspeak is far more sinister: it is "a particular way of thinking and speaking about language—an approach or an attitude that treats language as a system and a code" (Illich & Sanders, 1988, p.112). The conception of communication on which the Plain English arguments rest also treats language as if it were a system or code. The proponents of the Plain English could well consider the Orwellian implications of their movement.

## References

- Burgess, A. (1964) *Language Made Plain*. Oxford University Press: London.
- Charrow, V. (1979) *What is Plain English Anyway?* Document Design Centre, Washington.
- Clarity (1992) No.25. Surrey: England.
- Cutts, M. & Maher, C. (1984) *Writing Plain English*. Stockport: Plain English Campaign.
- Cutts, M. & Maher, C. (1986) *The Plain English Story*: Stockport: Plain English Campaign.
- Danet, B. (1980) Language in the legal process. *Law & Society Review*, 14, 445-564.
- Eagleson, R. (1986) What Plain English means for lawyers. *Law Institute Journal*, 9, 938-939.
- Eagleson, R. (1990) *Writing in Plain English*. Canberra: Australian Government Printing Service.

- Gergen, K. & Semin, G. (1990) Everyday understanding in science and daily life. In G. Semin & K. Gergen (eds) *Everyday Understanding*. Sage: London.
- Gowers, E. (1962) *The Complete Plain Words*. Pelican: Harmondsworth.
- Goody, J. (1986) *The Logic of Writing and the Organisation of Society*. Cambridge University Press: Cambridge.
- Illich, I. & Sanders, B. (1988) *ABC: The Alphabetisation of the Popular Mind*. Marion Boyars: London.
- Kelly, D. (1989) User-friendliness in legislative drafting—the Credit Bill 1989. *Bond University Law Review*, 1, 143-156.
- Kimble, J. (1992) Plain English: A charter for clear writing. *Thomas M. Cooley Law Review*, 9(1), 1-58.
- King, N. (1983) *Plain English documents—a commercial view*. Text of a paper presented to Information Coordination Branch, Special Minister of State, Canberra, 14 June.
- Law Reform Commission of Victoria (1986) *Legislation, legal rights and Plain English*. Discussion paper.
- Law Reform Commission of Victoria (1990) *Access to the Law: The Structure and Format of Legislation*. Report No. 33.
- Orwell, G. (1962) *Inside the Whale and Other Essays*. Penguin: Harmondsworth.
- Penman, R. (1988) Communication reconstructed. *Journal for the Theory of Social Behaviour*, 18 (4), 391-410.
- Penman, R. (1990) Comprehensible insurance documents: Plain English isn't good enough. *CRLA Occasional Papers*, No. 14, August 1990.
- Penman, R. (1992) *Language, Legislation and writing for Action*. Keynote Address at Legislative Drafting Conference. Canberra, July 15.
- Reddy, M. (1979) The conduit metaphor—A case of frame conflict in our language about language. In A. Ortony (ed) *Metaphor and Thought*. Cambridge University Press: Cambridge

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- Redish, J. (1985) The Plain English Movement. In S. Greenbaum & B. Kachru (eds) *The English Language Today*. Oxford: Pergamon.
- Schön, D. (1979) Generative metaphor: A perspective on problem-setting in social policy. In A. Ortony (ed) *Metaphor and Thought*. Cambridge University Press: Cambridge.
- Sless, D. (1986) *In Search of Semiotics*. Croom Helm: London.
- Swaney, J., Janik, C., Bond, S. & Hayes, J. (1981) Editing for comprehension: Improving the process through reading protocols. *CDC Technical Report Series, 14*. Communication Design Center, Carnegie Mellon University, Pittsburgh.

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